

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA Title III

No. 17-BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III

No. 17-BK-4780-LTS

**INFORMATIVE MOTION AND NOTICE OF REQUEST TO BE
HEARD AT THE FEBRUARY 28, 2023 DISCLOSURE STATEMENT HEARING**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

The Ad Hoc Group of PREPA Bondholders (the “**Ad Hoc Group**”) submits this informative motion in response to the Court’s *Order Regarding Procedures for Hearing on February 28, 2023 Disclosure Statement Hearing* (the “**Order**”) setting forth guidelines for parties wishing to be heard at the February 28, 2023 disclosure statement hearing (the “**Hearing**”).

1. Amy Caton and Matthew M. Madden of Kramer Levin Naftalis & Frankel LLP will appear on behalf of the Ad Hoc Group at the Hearing.

2. Ms. Caton and Mr. Madden intend to participate in the Hearing and address the following matters:

- (i) *Omnibus Objections of the Ad Hoc Group of PREPA Bondholders to the Disclosure Statement for the Title III Plan of Adjustment of the Puerto Rico Electric Power Authority [ECF No. 3111], and Related Procedural Motions Related to the Disclosure Statement and Plan Confirmation [ECF Nos. 3113, 3114]* (Case No. 17-BK-4780-LTS, ECF No. 3189);
- (ii) *the Supplemental Objections of the Ad Hoc Group of PREPA Bondholders to the Disclosure Statement for the First Amended Title III Plan of Adjustment of the Puerto Rico Electric Power Authority [ECF No. 3201]* (Case No. 17-BK-4780-LTS, ECF No. [3225]); and
- (iii) any matter raised by any party at the Hearing related to the Title III cases, or any adversary proceeding pending in the Title III Cases, or the interests of the Ad Hoc Group.

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

Dated: San Juan, Puerto Rico
February 21, 2023

TORO COLÓN MULLET P.S.C.

/s/ Manuel Fernández-Bared

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**Admitted Pro Hac Vice*

*Counsel for the Ad Hoc Group of PREPA
Bondholders*

EXHIBIT A

EXHIBIT A
PARTY APPEARANCE SHEET

Name of Party	Ad Hoc Group of PREPA Bondholders
Party Name Abbreviation (For use with Zoom)	PREPA Ad Hoc Group
Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party): <ul style="list-style-type: none">• Name,• Email,• Law Firm,• Phone Number• Docket Entry No. for the Attorney's Notice of Appearance• Zoom Screen Name (See Disclosure Statement Hearing Procedures Order, ¶ 7(a))	Amy Caton acaton@kramerlevin.com Kramer Levin Naftalis & Frankel LLP (212) 715-9201 NOA: Dkt. No. 73 Zoom Screen Name: PREPA Ad Hoc Group / Caton, Amy / Kramer Levin Naftalis & Frankel LLP Matthew M. Madden mmadden@kramerlevin.com Kramer Levin Naftalis & Frankel LLP (202)775-4529 NOA: Dkt. No. 73 Zoom Screen Name: PREPA Ad Hoc Group / Madden, Matthew / Kramer Levin Naftalis & Frankel LLP
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a "Supplemental" Party Appearance Sheet.	N/A
Note: Pursuant to the Disclosure Statement Hearing Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time.	

EXHIBIT B

EXHIBIT B
PARTY EXHIBIT COVER SHEET²

Name of Party		Ad Hoc Group of PREPA Bondholders
Does the Party intend to offer evidence?		Yes (as needed)
Docket Entry No. for Party Exhibit List		23595 in 17-3283 and 3252 in 17-4780
Exhibit Identifier	Docket Entry No. of Exhibit	Is there a pending request to seal this Exhibit?
Ad Hoc Group's Exhibit 1	23595-1 / 3252-1	No
Ad Hoc Group's Exhibit 2	23595-2 / 3252-2	No
Ad Hoc Group's Exhibit 3	23595-3 / 3252-3	No
Pursuant to Bankruptcy Local Rule 9037-1(a), parties and counsel are solely responsible for redacting the personal identifiers enumerated in Fed. R. Bank. P. 9037(a).		

² The Ad Hoc Group reserves all rights, including the right to use exhibits identified on other parties' exhibits lists, the right to use additional exhibits for cross-examination or rebuttal if necessary, and the right to revise, amend, and/or supplement this list, for reasons including but not limited to the disclosure statement hearing is adjourned or if the Plan or Disclosure Statement is modified.